

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA (ALEXANDRIA)**

<b>UNITED STATES OF AMERICA</b>	)	
	)	
v.	)	<b>CASE NO. 1:16-CR-9-LO</b>
	)	
<b>OBAYEDUL HOQUE,</b>	)	
	)	
<b>Defendant</b>	)	

**DEFENDANT’S MOTION REQUESTING EARLY TERMINATION OF  
SUPERVISED RELEASE**

COMES NOW the defendant, Obayedul Hoque, by Gregory B. English, his retained counsel, and hereby submits this request that the defendant’s supervised release term be terminated immediately.

On July 18, 2018 the defendant was sentenced to imprisonment for 30 months and a supervised release term of two years. He was released from prison on November 16, 2018, so he has completed 19 months of a 24 month term of supervised release sentence. We submit that he requires no further supervision.

This court allowed the defendant to self-report to the BOP which he did without incident. While he was incarcerated his business was sold and the proceeds from that sale as well as his savings were used by his former attorney to make payments to the IRS in the total amount of \$1,008,823.00. Enclosed at Tab A is a

letter from Andrew Stewart to the defendant's wife Kazi Akter with copies of checks from his trust account totaling that amount.

While he was incarcerated the defendant was a model prisoner. He never received any disciplinary reports. On the contrary, he participated fully in the BOP's rehabilitation programs. Enclosed at Tab B are copies of the certificates which he earned. Since he has been on supervised release for the past 19 months, he has had no problems whatsoever. The court granted him permission to travel to Bangladesh for the period of January 19, 2020 until February 20, 2020 and he returned on time without incident. He has made the restitution payments required by the Probation Office in a timely fashion. He is currently employed as a restaurant manager and he supports his family. We note that he has one daughter who is a student at George Mason University, and another one who will enroll there in September.

Accordingly, we respectfully submit that he has done everything the court has asked of him and that no useful purpose would be served by continuing his

supervised release. Therefore, we respectfully request that this motion be granted.

Respectfully submitted,

/signed/

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**Certificate of Service**

I hereby certify that on the 11<sup>th</sup> day of June, 2020, I electronically filed the foregoing pleading with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following CM/ECF user:

AUSA Uzo Asonye  
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/signed/  
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